

KATHLEEN BLISS, ESQ. (NV Bar #7606)  
Email: kb@kathleenblisslaw.com  
**KATHLEEN BLISS LAW, PLLC**  
1070 West Horizon Ridge Parkway, Suite 202  
Henderson, Nevada 89012  
Tele: (702) 463-9074

**-and-**

PAUL S. PADDA, ESQ. (NV Bar #10417)  
Email: psp@paulpaddalaw.com  
DAVID J. STANDER, ESQ. (*Admitted PHV*)  
Email: dstanderlaw@gmail.com  
**PAUL PADDA LAW, PLLC**  
4560 South Decatur Blvd., Suite 300  
Las Vegas, Nevada 89103  
Tele: (702) 366-1888

**-and-**

DOUGLASS A. MITCHELL, ESQ. (NV Bar #3775)  
Email: dmitchell@jenner.com  
**JENNER & BLOCK, LLP**  
1099 New York Avenue, N.W., Suite 900  
Washington, D.C. 20001-4412  
Tele: (202) 639-6090

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

NAVAJO HEALTH FOUNDATION – SAGE  
MEMORIAL HOSPITAL, INC. (doing  
business as “Sage Memorial Hospital”); an  
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,  
LLC; a Nevada limited liability company  
(doing business as “Razaghi Healthcare”),  
AHMAD R. RAZAGHI; individually, TAUSIF  
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND  
TIME FOR RESPONSE TO AMENDED  
THIRD-PARTY COMPLAINT AND  
COUNTERCLAIMS  
(SECOND REQUEST)**

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and the Court's Local Rule of Civil Practice 7-2, Counter-Defendant (Navajo Health Foundation – Sage Memorial Hospital, Inc.), Third-Party Defendants (Christi El-Meligi and Netrishia Dalgai) and Counter-Claimant (Razaghi Development Company, LLC or "RDC")) hereby stipulate to permit Counter-Defendant and Third-Party Defendants additional time, to and until October 5, 2020, to respond to the Amended Third-Party Complaint and Counterclaims asserted by RDC on September 1, 2020. *See* ECF No. 92. The parties respectfully request the Court approve this stipulation. This is the parties' second stipulation for the purpose set forth herein. In requesting the Court approve this stipulation, the parties rely upon the following:

1. Counter-Claimant RDC filed a Third-Party Complaint and Counterclaim on July 23, 2020. *See* ECF No. 67. By Order filed August 25, 2020, Counter-Defendant and Third-Party Defendants were required to file a response to those claims on September 4, 2020. ECF No. 87. However, prior to that deadline, RDC filed an Amended Third-Party Complaint and Counterclaims. This amended filing renders the September 4, 2020 deadline moot.

2. The parties have communicated regarding this matter. Paul S. Padda, Esq., counsel for Third-Party Defendants and the Counter-Defendant, has communicated the fact to opposing counsel that he sustained a recent injury that has kept him away from his office during part of this past week and which has prevented him from completing a response to the Amended Third-Party Complaint. The additional time requested herein, to and until October 5, 2020, will provide sufficient time for undersigned counsel for the Third-Party Defendants and Counter-Defendant to complete a response to the Amended Third-Party Complaint and file it with the Court.

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3. The parties respectfully request the Court approve this stipulation.

/s/ Kris Leonhardt

/s/ Paul S. Padda

Pavneet S. Uppal, Esq.  
Kris Leonhardt, Esq.  
Brian L. Bradford, Esq.

Kathleen Bliss, Esq.  
Paul S. Padda, Esq.  
David Stander, Esq.  
Douglass A. Mitchell, Esq.

*Counsel for Razaghi Development Company, LLC*

*Counsel for Christi El-Meligi,  
Netrishia Dalgai and Navajo Health  
Foundation – Sage Memorial  
Hospital, Inc.*

Dated: September 23, 2020

Dated: September 23, 2020

**IT IS SO ORDERED:**

  
**UNITED STATES MAGISTRATE JUDGE**

**DATED:** September 24, 2020